

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

TEAL PEAK CAPITAL, LLC;

Plaintiff,

v.

ALAN BRAM GOLDMAN;

Defendants.

Civil No. 3:20-cv-1747

Breach Of Contract; Specific
Performance Of Contract;
Reimbursement Of Funds, Costs
And Expenses

**Motion for Extension of Time to Oppose
Request for Judgment on the Pleadings**

To the Honorable Court:

Comes Now, Teal Peak Capital, LLC (“TPC”), and through the undersigned attorney, respectfully states and prays:

1. On May 24, 2021, defendant Alan Bram Goldman (“Mr. Goldman”) asked this Honorable Court to enter Judgment based on the pleadings averred in his Amended Counterclaim or, in the alternative, to consider as admitted –without pointing to any— the “well-pled factual allegations”. All because the Amended Counterclaim was filed on April 16, 2021 and TPC missed the single deadline of May 7, 2021 to respond to the Amended Counterclaim.

2. Following the requests, this Court ordered TPC to respond no later than today, June 8, 2021.

3. TPC wishes to oppose Mr. Goldman’s two requests and demonstrate that neither have merits much less apply to the present circumstances. Unfortunately, a

matter of grave importance to two clients diverted the undersigned's efforts to complete the opposition, occupying all his time during the last two days. Fortunately, the motion does not require much time to be completed and we estimate that with a short extension of only two days TPC's will be able to file its opposition.

4. We assure the court that this request in no way is filed to delay the proceedings. As explained yesterday in the Joint Motion, the parties have begun settlement conversations and will initiate the exchange of written discovery by June 25, 2021. Furthermore, two parties who were joined in the Amended Cross Claim have yet to be served with summons. So, the pleading stage is still open for all procedural and substantive purposes. Moreover, TPC has filed today its Answer to the Amended Counterclaim. In this scenario, all TPC asks is to be granted the opportunity to have its day in court and adequately demonstrate that Mr. Goldman's requests lack merits by granting it a short extension of two days, extension that is reasonable given the stage of the proceedings and the fact that no undue delay nor harm will be caused.

Wherefore, TPC respectfully requests from this Honorable Court to grant it an extension of no more than two days to file its opposition to Mr. Goldman's requests for Judgment on the Pleadings, so the term expires on Thursday, June 10, 2021.

Respectfully Submitted.

In San Juan, Puerto Rico, this 8th day of June, 2021.

I hereby certify that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF system, which will send notice of its filing electronically to the attorneys of record.

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s/Adrián Sánchez-Pagán

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